

Remarks

This Application has been carefully reviewed in light of the Office Action mailed August 23, 2004. Applicants appreciate the Examiner's consideration of the Application. Applicants have made clarifying amendments to Claims 1-3, 7, and 9, and have canceled Claims 4-5 without prejudice or disclaimer. Certain of these amendments are not considered narrowing or necessary for patentability. Applicants have also added new Claims 10-47, none of which add any new matter. Applicants respectfully request reconsideration and allowance of all pending claims, and consideration and allowance of all new claims.

I. Information Disclosure Statement

Applicants mailed Information Disclosure Statements (IDSs) and accompanying PTO-1449 forms on July 18, 2001 and January 8, 2002, but the submitted references were not indicated as considered by the Examiner in this Office Action. Additionally, Applicants mailed a Request for Consideration of an Information Disclosure Statement Timely Filed on September 17, 2004. Applicants respectfully request the Examiner to indicate consideration of the submitted references by initialing next to each reference on the PTO-1449 forms. For the Examiner's convenience, copies of the IDSs and PTO-1449 forms are attached to this Response.

II. Applicants' Claims are Allowable over the Proposed *Glasser-PAG* Combination

The Examiner rejects Claims 1-9 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,956,715 to Glasser, et al. ("*Glasser*") in view of "Purveyor Administrator's Guide" ("*PAG*"). Applicants respectfully disagree and discuss independent Claim 1 as an example.

At a minimum, neither *Glasser* nor *PAG*, whether considered alone or in combination, disclose, teach, or suggest the following limitations recited in Claim 1, as amended:

- a plurality of roles defining user rights to access one or more of the plurality of assets, each member associated with at least one role;
- at least one domain being an administrative and access control boundary around a plurality of security entities, the security entities of the at least one domain comprising:
 - a subset of the plurality of assets and the access control lists

- corresponding to the assets in the subset of the assets;
 - a subset of the plurality of roles; and
 - a subset of the members;
- each privilege defined in the access control lists of the at least one domain identifying one or more roles in the domain that may access the asset corresponding to the privilege;
- the security system operable to authorize a particular member to perform a requested operation with respect to a requested asset within the domain when the particular member is associated with a role, in the domain, corresponding to a privilege for the requested asset.

For example, *Glasser* fails to disclose, teach, or suggest “a plurality of roles defining user rights to access one or more of the plurality of assets, each member associated with at least one role,” as recited in Claim 1 as amended. The Examiner apparently equates the list of user groups disclosed in *Glasser* with the “plurality of roles” recited in Claim 1. (See Office Action, Page 2; *Glasser*, Column 5, Line 58) Applicants respectfully submit that this equation is improper. For example, a role does not necessarily require a group of users. A role could be assigned to a single user or a group of users. Indeed, Applicants’ Specification even describes groups 32 and roles 34 as distinct entities in the example system described in the Specification. (See Specification, Pages 8 and 18-19) Thus, while *Glasser* discloses lists of user groups, *Glasser* fails to disclose, teach, or suggest “a plurality of roles defining user rights to access one or more of the plurality of assets, each member associated with at least one role,” as recited in Claim 1 as amended. *PAG* fails to account for this deficiency of *Glasser*.

As another example, neither *Glasser* nor *PAG* discloses, teaches, or suggests the “at least one domain,” as recited in Claim 1. The Examiner apparently acknowledges that *Glasser* fails to teach the at least one domain recited in Claim 1. (See Office Action, Page 3) However, the Examiner argues that *PAG* does teach this limitation, stating that *Glasser* “does not teach for the network to comprise the Internet which uses resources on many domains. *PAG* teaches an access control system for use on Internet servers using access control lists and restricting by domain.” (Office Action, Page 3, citations omitted) As disclosing this at least one domain (as recited in Claim 1 prior to the amendments presented in this Response), the Examiner references *PAG*’s disclosure that access can be controlled based upon the client’s IP address. (See Office Action, Page 3; *PAG*, Page 1, Line 9) Applicants respectfully

submit that the mere disclosure in *PAG* that access can be controlled based upon a client's IP address fails to disclose, teach, or suggest the "at least one domain," as recited in Claim 1. In particular, restricting access based on a client's IP address fails to disclose, teach, or suggest "at least one domain being an administrative and access control boundary around a plurality of security entities, the security entities of the at least one domain comprising: a subset of the plurality of assets and the access control lists corresponding to the assets in the subset of the assets; a subset of the plurality of roles; and a subset of the members," as recited in Claim 1 as amended.

As another example, at least because *Glasser* and *PAG* fail to disclose, teach, or suggest the "at least one domain," as recited in Claim 1, both *Glasser* and *PAG* necessarily fail to disclose, teach, or suggest "each privilege defined in the access control lists of the at least one domain identifying one or more roles in the domain that may access the asset corresponding to the privilege" and "the security system operable to authorize a particular member to perform a requested operation with respect to a requested asset within the domain when the particular member is associated with a role, in the domain, corresponding to a privilege for the requested asset," as recited in Claim 1 as amended.

Moreover, Applicants do not admit that it is possible to combine *Glasser* and *PAG* in the manner proposed by the Examiner or that the Examiner has shown the requisite teaching, suggestion, or motivation in the cited references to combine or modify the *Glasser* and *PAG* in the manner proposed by the Examiner.

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 1 and its dependent claims. For substantially similar reasons, Applicants respectfully request reconsideration and allowance of independent Claim 7 and its dependent claims.

III. New Claims 10-47 are Allowable

In addition to being dependent on allowable independent claims, new Claims 10-21 (which depend from independent Claim 1) and new Claims 22-33 (which depend from independent Claim 7) recite further patentable distinctions over the prior art of record. To

avoid burdening the record and in view of the clear allowability of independent Claims 1 and 7, Applicants do not discuss these distinctions in this Response. However, Applicants reserve the right to discuss these distinctions in a future Response or on Appeal, if appropriate. Furthermore, new Claims 34-47 are directed to software and are allowable for at least the same reasons discussed above with reference to Claims 1-3 and 6 and new Claims 10-21 (which Applicants have shown to be allowable).

IV. No Waiver

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the references cited by the Examiner. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a future Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements. The example distinctions discussed by Applicants are sufficient to overcome the Examiner's rejections.

C nclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicants, at the Examiner's convenience at (214) 953-6812.

The Commissioner is hereby authorized to charge the amount of \$450.00 to Deposit Account No. 02-0384 of Baker Botts L.L.P. to cover the cost of twenty-five new claims total over twenty. Although Applicants believe no other fees are due, the Commissioner is hereby authorized to charge any other fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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